

STATE OF INDIANA

FILED

INDIANA UTILITY REGULATORY COMMISSION JUN 12 2000

In the Matter of the Petition of)
Indiana Bell Telephone Company,)
Incorporated d/b/a Ameritech Indiana)
Pursuant to I.C. 8-1-2-61 For a Three)
Phase Process For Commission)
Review of Various Submissions of)
Ameritech Indiana to Show Compliance)
with Section 271(c) of The Telecommunications)
Act of 1996)

INDIANA UTILITY
REGULATORY COMMISSION

Cause No. 41657

In The Matter Of The Commission's)
Generic Investigation Of)
Incumbent Local Exchange)
Carriers' Provision Of Operating)
Support Systems ("OSS"))

Cause No. 41324

**AMERITECH INDIANA'S REVISED RESPONSES TO THE PRESIDING
OFFICERS QUESTIONS IN THE MAY 26, 2000 DOCKET ENTRY**

Comes now Indiana Bell Telephone Company, Incorporated d/b/a Ameritech Indiana ("Ameritech Indiana"), by counsel and submits the following revised responses to the questions posed by the presiding officers in the May 26, 2000 docket entry in this case. In its initial filing of these responses, Ameritech Indiana inadvertently omitted the Caption for Cause No. 41324. This Revised Response, containing only revisions to the caption and service list, is being served on all parties in both Cause No. 41324 and 41657.

I. PRELIMINARY MATTER

Ameritech Indiana believes the Indiana Utility Regulatory Commission ("Commission") should be aware that Ameritech Indiana was not served with the May 18, 2000 docket entry in this case, nor with either of the May 26 docket entries. Ameritech

Indiana was made aware of these entries via communications with the Indiana Office of Utility Consumer Counselor ("OUCC") on another matter, and received the entries from the OUCC late in the day on June 1, 2000. In addition, we have recently had similar experiences in Cause Nos. 40849, 40785-S1 and 41535. It is Ameritech Indiana's understanding that the Commission's docket book lists filings made by parties with the Commission. Docket entries and other items issued by the Commission are not recorded in this book. As a result, parties are unable to check the status of many aspects of Commissions proceedings. In particular, a party must rely on the Commission to serve copies of its pronouncements as there is no public record of the docket entries. The Commission's web site lists only "select docket entries" with the most recent docket entry being dated January 26, 2000.

In courts and other quasi-judicial agencies, a paper or computerized listing of all entries or other filings is generally available to the parties. Therefore, a periodic check of a case docket record maintained by the Court and available to parties and other members of the public provides a secondary mechanism to guard against a lack of notice through the inadvertent failure of service. Ameritech Indiana would respectfully suggest that a comprehensive docket book or record of this nature would be a valuable tool to assist both parties to causes before the Commission and the Commission itself to avoid delay and confusion due to failure of service. In addition, it would be helpful to the parties to have the ability to obtain or review paper or electronic copies of all docket entries on a daily or weekly basis. Ameritech Indiana would further respectfully suggest that such issue might appropriately be brought to the attention of the Commission's Practices and Procedures

Committee or the Indiana State Bar Association Utility Law Section for further study and possible resolution.

II. GENERAL COMMENTS ON COMMISSION CONSULTANTS

The May 18, 2000 docket entry in this case named John Kern as the facilitator of the 271 process and directed Ameritech Indiana at its sole expense to retain Mr. Kern. In addition, one of the May 26, 2000 docket entries directed Ameritech Indiana, at its sole expense, to retain MTG Consulting and Mr. Frank Darr of the National Regulatory Research Institute, to assist the Commission on third-party OSS testing and the overall structure of the 271 proceeding generally. The other May 26, 2000 docket entry required Ameritech Indiana and other parties to answer four questions posed by the presiding officers by June 2, 2000. The Commission issued a docket entry on June 1, 2000 extending the deadline since the parties did not receive the docket entry requesting responses to the questions.

The Commission's actions in indicating an intent to utilize these separate consultants during the 271 process leave many unanswered questions. The Commission originally indicated at the Attorneys' Conference in this case held on April 14, 2000 and in its April 24, 2000 docket entry that it might hire Mr. Darr to assist in hiring a project administrator. Now that the project administrator has been hired, it is unclear what purpose Mr. Darr will serve. Since the Commission did not allow Ameritech Indiana or any other party to participate in the RFP and/or hiring process, the scope of the "surrogate staff" is unclear. Without further information, there appears to be no limitation on the number of hours to be worked by the "surrogate staff". Ameritech Indiana does not know how the

Commission envisions using the "surrogate staff" nor how three consultants will work together. These undefined, yet critical issues expose Ameritech Indiana to a potentially huge financial liability with little or no control over costs.

Ameritech Indiana's comments filed on May 1, 2000 and May 8, 2000 encouraged the Commission to take advantage of the collaboratives and 271 processes that had already begun and are currently ongoing in the other Ameritech states due to the similarity of parties and processes existing in the region. This additional layer of oversight suggested by hiring two additional consultants seems to complicate an already complex process and introduce new players to an already crowded field. Ameritech Indiana urges the Commission to follow the lead of the other Ameritech state commissions and participate in ongoing proceedings in the Ameritech region to best utilize scarce resources, without adding additional layers of administration and bureaucracy to the process. Although Ameritech Indiana does not object to the Commission hiring one consultant at Ameritech Indiana's expense to simplify the process, Ameritech Indiana does have concerns about the Commission hiring "surrogate staff" at Ameritech Indiana's expense.

Ameritech Indiana would respectfully request that the presiding officers reconsider their decision to hire MTG and Frank Darr, or at the very least, agree to meet with Mr. Kern and representatives of Ameritech to discuss in what capacity the "surrogate staff" will be employed, the extent of their expected participation, the potential cost, and other relevant factors.

III. QUESTIONS POSED BY THE PRESIDING OFFICERS IN THE MAY 26, 2000 DOCKET ENTRY

1. Should the Commission transfer to this docket consideration of the Ameritech Indiana baseline OSS performance measures which are being developed in Phase 2 of Cause No. 41324?

Ameritech Indiana believes it would make sense from a resource efficiency perspective to transfer the consideration of OSS performance measures being developed in Phase 2 of Cause No. 41324 into this case. The OSS performance measures adopted in the Joint Stipulation for Ameritech Indiana are different than the OSS performance measures adopted for GTE and Sprint in that document. Therefore, it would make sense to move the Ameritech Indiana OSS performance measures to this docket since the OSS testing and other 271 issues will be addressed in this case.

2. In addition to carrier-to-carrier performance measures, are there any other issues that are currently being discussed in Phase 2 of Cause No. 41324 which should be transferred to this docket? The Presiding officers ask parties to limit their responses to unresolved issues identified in the Status Report following the March 13-14 workshops in Cause No. 41324, which include third-party testing, penalties, statistical testing, business rules and formulas, new performance measures, forecasting requirements and operational issues.

The following items from the March 13-14 status report should be transferred to this cause: 2) OSS Third Party testing; 4) structure of certain performance standards; 6) disaggregation; 7) business rules and formulas for certain performance measurements; 8) new performance measurements including those adopted in other states; 9) forecasting

requirements; and 12) operational issues. Any additional issues that are raised in collaboratives in other Ameritech states would also be appropriate issues to be included in this case.

3. If the Commission transfers Ameritech Indiana to this docket (as described above), what impact, if any, will this have on Cause No. 41324? The Presiding officers ask parties to consider revisions to the existing procedural schedule in Cause No. 41324 in their responses.

Transferring the associated OSS performance measures to Ameritech Indiana's 271 docket will not have an adverse impact on Cause No. 41324. The remaining parties to that case will be able to address the appropriate issues for GTE and Sprint in that case without regard to the Ameritech Indiana 271 proceeding. However, if there is an overlap, many of the same parties are also parties to this case and could monitor any potential overlap of issues. If Ameritech Indiana's OSS performance measure issues are moved to the 271 case, Ameritech Indiana does not have any proposed revisions to the existing procedural schedule in Cause No. 41324.

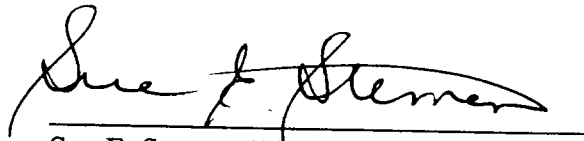
4. If the Commission transfers consideration of the OSS performance measures from Cause No. 41324 to this docket, would it be possible for the Commission to consider OSS cost-recovery for Ameritech Indiana in Phase 3 of Cause No 41324?

Yes. The Commission could consider Ameritech Indiana's OSS cost recovery in Phase 3 of Cause No. 41324 or in a separate docketed proceeding if it determined that would be appropriate. However, it may make sense to move Ameritech Indiana's OSS cost recovery to a cost proceeding involving Ameritech Indiana only, such as Cause No. 40611

and to consider GTE and Sprint OSS cost recovery issues in separate company proceedings as well.

WHEREFORE, Ameritech Indiana respectfully requests that the Commission's presiding officers reconsider the hiring of Mr. Darr and MTG or in the alternative, set a meeting with representatives of Ameritech and Mr. Kern to discuss the role of the "surrogate staff" in this proceeding; remove the consideration of Ameritech Indiana's OSS performance measures from Cause No. 41324 and consider those issues in this case; continue to include Ameritech Indiana's OSS cost recovery issues in Cause No. 41324 or in a separate, company-specific docket; and for all other relief for Ameritech Indiana proper in the premises.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sue E. Stemen", written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of *Ameritech Indiana's Revised Responses To The Presiding Officers Questions In The May 26, 2000 Docket Entry* was served upon the following this 12th day of June 2000.

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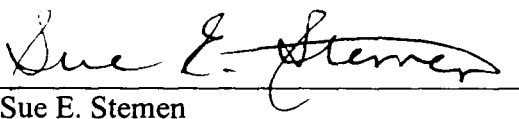
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